

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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| U.S. DISTRICT COURT<br>NORTHERN DISTRICT OF TEXAS<br><b>FILED</b><br>NOV 28 2000<br>CLERK, U.S. DISTRICT COURT<br>By <u>                    </u> Deputy |
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STEPHEN E. JONES, LINDA D.  
LYDIA, and CAROLINE FRANCO,  
as Texas registered voters,

Plaintiffs,

v.

GEORGE W. BUSH, RICHARD B.  
CHENEY, ERNIE ANGELO,  
GAYLE WEST, BETTY R. HINES,  
JAMES B. RANDALL, HELEN  
QUIRAM, HENRY W. TEICH, Jr.,  
WILLIAM EARL JUETT, HALLY B.  
CLEMENTS, HOWARD PEBLEY, Jr.,  
ADAIR MARGO, TOM F. WARD, Jr.,  
CAMRMEN P. CASTILLO, CHUCK  
JONES, MICHAEL PADDIE, JAMES  
DAVIDSON WALKER, JOSEPH I.  
ONIELL III, BETSY LAKE, ROBERT  
J. PEDEN, JIM HAMLIN, MARY E.  
COWART, SUE DANIEL, JAMES R.  
BATSELL, LOYCE McCARTER,  
MICHAEL DUGAS, NEAL J. KATZ,  
MARY CEVERHA, CLYDE MOODY  
SIEBMAN, RANDALL TYE THOMAS,  
CRUZ G. HERNANDEZ, JOHN ABNEY  
CULBERSON, STAN STANART, and  
KEN CLARK,

Defendants.

CIVIL ACTION NO.

3:00-CV-2543-D

**PLAINTIFFS' FIRST COMBINED SET OF INTERROGATORIES  
AND REQUESTS FOR ADMISSIONS TO DEFENDANT RICHARD B. CHENEY**

TO: Defendant, Richard B. Cheney, by and through his attorneys of  
record, Barry F. McNeil, Robin P. Hartmann, and Stacy L. Brainin,  
HUGHES & LUCE, L.L.P., 3100 NationsBank Plaza, Dallas, Texas  
75202.

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Pursuant to Rules 26, 33, and 36 of the Federal Rules of Civil Procedure, and this Court's Order of November 27, 2000, Plaintiffs serve the following Interrogatories and Requests for Admissions on Defendant Richard B. Cheney.

**INSTRUCTIONS and DEFINITIONS**

1. Defendant's Answers to the following Interrogatories shall be responsive through the date upon which the Answers to these Interrogatories are served upon Plaintiff and shall be continuing in nature and require Defendant to seasonably supplement or amend its Answers thereto in accordance with Rule 26(e)(1), (2) and (3).

2. Space has been provided for the Answer of Defendant. However, the space provided shall not be construed as a limitation on Defendant's obligation to respond fully, and, if necessary, additional pages may be attached for the completion of the Answer.

3. Definitions:

- a. The terms "you" and "your" as used herein shall mean Richard B. Cheney.
- b. The terms "relating to" and "relate to" as used herein shall require you to fully discuss, fully describe, list, and/or provide any and all facts, information, opinions, bases of such opinions, and/or documents which might possibly be relevant (as that term is defined in the Federal Rules of Evidence), which might possibly lead to the discovery of relevant evidence, concerning, and/or otherwise related to (as commonly defined and understood) the facts, information, knowledge, opinions and bases thereof, and/or documents which are in any way responsive to the specific interrogatory and/or request for production of documents in which such term(s) appear.

c. "Identify" when referring to a natural person means to provide an identification sufficient to notice a deposition of such person and to serve such person with process to require his or her attendance at a place of examination and shall include, without limitation, his or her full name, present or last known home address, present or last known home telephone number, present or last known business affiliation and address, business telephone number, title and occupation.

d. "Identify" when referring to a document or writing means to give sufficient characterization of such document or writing, including but not limited to the name of the document, its location, the name and title of its custodian, the date it was written, the author of the document and the name and job title of the person to whom it was addressed, its length, and a synopsis of its contents, so as to have identified it with reasonable particularity for the purpose of a request for production of documents under Rule 34 of the Federal Rules of Civil Procedure.

e. "Identify" when referring to an organization, corporation or business entity means to provide an identification sufficient to notice a deposition of any representative of that entity identified in response to any interrogatory herein and to serve such representative of that entity with process to require his or her attendance at a place of examination and shall include, without limitation, the full name of the entity, its present or last known address, present or last known telephone number, and a description of its business or organizational purpose.

## **REQUESTS FOR ADMISSIONS**

### **Request for Admission No. 1**

As of November 27, 2000, you had not, nor had anyone on your behalf, notified the Chief Appraiser of the Dallas Central Appraisal District in writing that your right to a homestead exemption on your home located at 3812 Euclid Avenue, Highland Park, Texas, had ended.

#### **RESPONSE:**

### **Request for Admission No. 2**

During the time period January 1, 2000 and November 27, 2000, neither you nor your spouse filed a change-of-address form with the United States Post Office.

#### **RESPONSE:**

### **Request for Admission No. 3**

You have publicly referred to your house in Jackson Hole, Wyoming as a "vacation home" or words to that effect.

#### **RESPONSE:**

**Request for Admission No. 4**

You have at all times during the past year intended to continue living with your spouse through 2000 and 2001.

**RESPONSE:**

**Request for Admission No. 5**

As of November 27, 2000, your spouse had not "canceled" her Texas voters registration or Texas drivers license.

**RESPONSE:**

## **INTERROGATORIES**

### **Interrogatory No. 1**

Identify by name of state and dates of inhabitation every state of which you contend you have been an inhabitant at any time during the time period January 1, 1996 to the present.

**ANSWER:**

### **Interrogatory No. 2**

If you have changed the state of your inhabitation since January 1, 1996, please state all facts upon which you rely to support your allegation that you are/were an inhabitant of the subsequent state(s).

**ANSWER:**

**Interrogatory No. 3**

Identify (by type of vehicle, make and model) all vehicles (automobiles, boats, motorcycles) currently owned or leased by you and/or your spouse and for each:

- a) identify the state(s) in which such vehicle(s) have been registered by (or on behalf of) you and/or your spouse;
- b) identify the date(s) of registration of each vehicle in each state; and,
- c) state the physical location (by city and state) of each such vehicle during the past thirty days.

**ANSWER:**

**Interrogatory No. 4**

Identify all states in which you have held a drivers license within the past one year and the dates you held such license(s).

**ANSWER:**

**Interrogatory No. 5**

Identify by type of card and cardholder<sup>1</sup> all credit cards held by you and/or your spouse and state the billing address of each for the time period January 1, 2000 through November 27, 2000.

**ANSWER:**

**Interrogatory No. 6**

Identify by magazine name and subscription-holder, all magazines to which you and/or your spouse subscribe and state the mailing address of each for the time period January 1, 2000 through November 27, 2000.

**ANSWER:**

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<sup>1</sup> Note – this Interrogatory does not seek card numbers.



**Interrogatory No. 7**

State all dates since July 19, 1999, that you have spent the night in your Jackson Hole, Wyoming house.

**ANSWER:**

**Interrogatory No. 8**

State the address listed on your personal income tax return for the tax year 1999.

**ANSWER:**

**Interrogatory No. 9**

State your address listed on your quarterly estimated tax payment (Form 1040-ES) due September 15, 2000.

**ANSWER:**

**Interrogatory No. 10**

State all reasons you terminated your employment with Halliburton.

**ANSWER:**

**Interrogatory No. 11**

Identify the date you “re-registered to vote in Wyoming.”

**ANSWER:**

**Interrogatory No. 12**

Up to and including the date that you agreed to be the Republican candidate for Vice-President, describe in detail each and every conversation you had with George W. Bush regarding the possibility of your being the Vice-Presidential candidate, including the date and place of each such conversation.

**ANSWER:**

**Interrogatory No. 13**

Describe in detail each and every conversation you have had with any person regarding the possibility of a constitutional impediment to your being the Vice-Presidential candidate due to your inhabitation in Texas, including the date and place of each such conversation.

**ANSWER:**

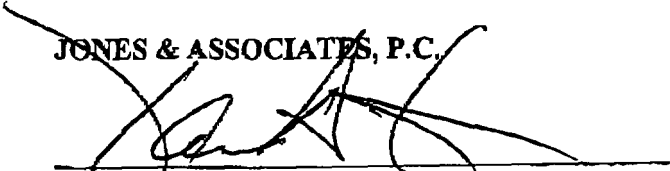
**Interrogatory No. 14**

Identify all real property in which you own an interest including, without limitation, description, address, city, county, state, and approximate square footage of all improvements on such property.

**ANSWER:**

Dated: November 28, 2000

**JONES & ASSOCIATES, P.C.**



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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

This is to certify that at 8:55 a.m. on the 28<sup>th</sup> day of November, 2000, a true and correct copy of the above and foregoing *Plaintiffs' First Combined Set of Interrogatories and Requests for Admissions to Defendant Richard B. Cheney* was served by facsimile on the following counsel for Defendants in compliance with this Court's Order of November 27, 2000:

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James A. Jones